

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

|   |                          |
|---|--------------------------|
| In re:  |                          |
| THE FINANCIAL OVERSIGHT AND MANAGEMENT            | PROMESA Title III        |
| BOARD FOR PUERTO RICO,                            |                          |
| as representative of                              | No. 17-03283 -LTS        |
| THE COMMONWEALTH OF PUERTO RICO, <i>et. al.</i> , | (Jointly Administered)   |
| Debtor  |                          |
| LUIS A. RIVERA SIACA                              |                          |
| Movant,   | <b>Re: ECF No. 23145</b> |
| v.  |                          |
| THE FINANCIAL OVERSIGHT AND MANAGEMENT            |                          |
| BOARD FOR PUERTO RICO                             |                          |
| as representative of                              |                          |
| THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>    |                          |
| Debtors   |                          |

**MOTION FOR LEAVE TO FILE REPLY BRIEF IN EXCESS OF FIFTEEN PAGES**  
**TO THE HONORABLE COURT:**

COMES NOW, Luis A. Rivera Siaca (“LARS”), through its undersigned counsel, and respectfully states and requests:

1. On December 22, 2022, LARS filed his *Motion for the Payment of Administrative Rent (ECF No. 23145)* (the “Motion”).
2. On that same date, the Court entered an order scheduling briefing on the Motion granting the Financial Oversight and Management Board for Puerto Rico (the “Board”) until

January 6, 2023, at 5:00 p.m. (Atlantic Standard Time) to respond to the Motion and LARS until January 13, 2023, at 5:00 p.m. (Atlantic Standard Time) to file his reply.

3. On January 6, 2023, the Board filed its response to the Motion (**ECF No. 23210**).

4. The Court's Sixteenth Amended Notice, Case Management and Administrative Procedures provides in paragraph I(E) that unless prior permission has been granted, memoranda of law in support of replies are limited to fifteen (15) pages (**ECF No. 20190-1**).

5. Contemporaneously herewith, LARS is filing his Reply to Objection of the Commonwealth of Puerto Rico to Motion for the Payment of Administrative Rent, consisting of eighteen (18) pages, that is three (3) pages in excess of the limit indicated in the preceding paragraph.

6. The issues raised by the Motion are complex as to the factual scenario and the position of the Board regarding the requirements sought to be imposed thereby on private persons and entities contracting with agencies of the Commonwealth of Puerto Rico under the Board's interpretation of its powers under PROMESA Section 204(b)(2). Furthermore, while the Motion refers to one of two lease agreements entered into by LARS, as lessor, with the Department of Education of Puerto Rico, as lessee, in its response the Board also refers to the other contract object of the motion for payment of administrative rent filed by LARS on July 1, 2022, pending before the Court at **ECF No. 21408**, which is intimately related to the one filed in this case. Consequently, LARS also addresses those common elements as to the two contracts, which will assist the Court in considering both contested matters at the same time.

**WHEREFORE**, it is respectfully requested that LARS be granted leave to file his reply in excess of fifteen (15) pages.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all ECF participants.

San Juan, Puerto Rico this 13<sup>th</sup> day of January 2023

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